



CORPORATION SERVICE COMPANY®

## Notice of Service of Process

SLM / ALL  
Transmittal Number: 11682300  
Date Processed: 10/07/2013

**Primary Contact:** Pamela Hoff  
The Travelers Companies, Inc.  
385 Washington Street, MC 515A  
Saint Paul, MN 55102

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<b>Entity:</b>	Travelers Casualty Insurance Company of America Entity ID Number 2317367
<b>Entity Served:</b>	Travelers Casualty Ins. Co. Of America
<b>Title of Action:</b>	Reverend Walter Womack vs. Travelers Casualty Insurance Company
<b>Document(s) Type:</b>	Summons/Complaint
<b>Nature of Action:</b>	Contract
<b>Court/Agency:</b>	Shelby County Chancery Court, Tennessee
<b>Case/Reference No:</b>	CH-13-1409-1
<b>Jurisdiction Served:</b>	Tennessee
<b>Date Served on CSC:</b>	10/07/2013
<b>Answer or Appearance Due:</b>	30 Days
<b>Originally Served On:</b>	Dept of Ins-TN on 10/02/2013
<b>How Served:</b>	Certified Mail
<b>Sender Information:</b>	Lewis K. Garrison, Sr. 901-527-6445

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**  
*CSC is SAS70 Type II certified for its Litigation Management System.*  
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | [sop@cscinfo.com](mailto:sop@cscinfo.com)

**STATE OF TENNESSEE**  
**Department of Commerce and Insurance**  
**500 James Robertson Parkway**  
**Nashville, TN 37243-1131**  
**PH - 615.532.5260, FX - 615.532.2788**  
**Jerald.E.Gilbert@tn.gov**

October 2, 2013

Travelers Casualty Ins. Co. Of America  
2908 Poston Avenue, % C S C  
Nashville, TN 37203  
NAIC # 19046

Certified Mail  
Return Receipt Requested  
7012 1010 0002 9210 2022  
Cashier # 11193

Re: Reverend Walter Womack, Et Al V. Travelers Casualty Ins. Co. Of America

Docket # CH-13-1409-1

To Whom It May Concern:

Pursuant to Tennessee Code Annotated § 56-2-504 or § 56-2-506, the Department of Commerce and Insurance was served October 2, 2013, on your behalf in connection with the above-styled proceeding. Documentation relating to the subject is herein enclosed.

Jerald E. Gilbert  
Designated Agent  
Service of Process

Enclosures

cc: Chancery Court Clerk  
Shelby County  
140 Adams Street, Rm 308  
Memphis, Tn 38103

~~(CIRCUIT CHANCERY)~~ COURT OF TENNESSEE  
 140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103  
 FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

**SUMMONS IN CIVIL ACTION**

Docket No. CH-13-1409-1
☒ Lawsuit  
☐ Divorce
Ad Damnum \$ 450,000

Reverend Walter Womack and  
 Faithful Baptist Church

VS

Travelers Casualty Insurance Company

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Method of Service:

Travelers Casualty Insurance Company  
 Travelers Service Center  
 P. O. Box 1564  
 Elmira, NY 14902-1564 by serving the Commissioner of Insurance for the State of Tennessee

☐ Certified Mail  
☐ Shelby County Sheriff  
☒ Commissioner of Insurance (\$)  
☐ Secretary of State (\$)  
☐ Other TN County Sheriff (\$)  
☐ Private Process Server  
☐ Other

(\$ ) Attach Required Fees .

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and  
 serving a copy of your answer to the Complaint on Lewis K. Garrison, Sr. Plaintiff's  
 attorney, whose address is 145 Court Ave., Suite 402, Memphis, TN 38103, telephone 527-6445  
 within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a  
 judgment by default may be taken against you for the relief demanded in the Complaint.

TESTED AND ISSUED

Sept. 17, 2013

By

Jennifer Hae

, D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:  
 Tennessee law provides a four thousand dollar (\$4,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment  
 should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish  
 to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless  
 it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain  
 items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and  
 your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of  
 these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish  
 to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I JIMMY MOORE / DONNA RUSSELL, Clerk of the Court,  
 Shelby County, Tennessee, certify this to be a true and  
 accurate copy as filed this

JIMMY MOORE, Clerk / DONNA RUSSELL, Clerk and Master

By: \_\_\_\_\_, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ M. a copy of the summons  
and a copy of the Complaint to the following Defendant \_\_\_\_\_  
at \_\_\_\_\_

Signature of person accepting service

By: \_\_\_\_\_  
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant \_\_\_\_\_  
because \_\_\_\_\_ is (are) not to be found in this County after diligent search and inquiry for the following  
reason(s): \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

By: \_\_\_\_\_  
Sheriff or other authorized person to serve process

**IN THE CHANCERY COURT OF SHELBY COUNTY, TENNESSEE  
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

**REVEREND WALTER WOMACK and  
FAITHFUL BAPTIST CHURCH,**

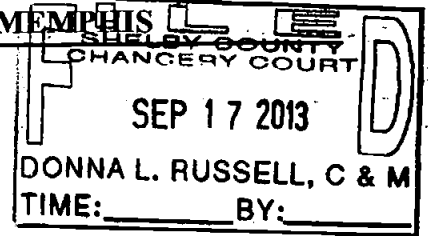
Plaintiffs,

vs.

No.: - **CH-13-1409-1**  
Part

**TRAVELERS CASUALTY INSURANCE  
COMPANY,**

Defendant.



**COMPLAINT *FOR DAMAGES***

COMES NOW the Plaintiffs, Reverend Walter Womack and Faithful Baptist Church, and  
sues the named Defendant, Travelers Casualty Insurance Company, for damages and alleges as  
follows:

I.

Plaintiff, Reverend Walter Womack is the pastor of Faithful Baptist Church and Faithful Baptist Church is located at 1580 Ely Street in Memphis, Tennessee; that Travelers Casualty Insurance Company is in the business of casualty insurance coverage for buildings insuring against fire and wind damage; that Plaintiffs purchased an insurance policy with Defendant, Travelers Casualty Insurance Company covering damages to the Faithful Baptist Church; that Plaintiffs allege that Defendant represented to them that the policy was an "all risk" policy covering all losses that the Plaintiff might suffer; that said premiums were current with the Defendant.

III.

Plaintiff further alleges that the Defendant has failed to provide any reasonable cause or excuse for not paying this claim; that proper notice was given and the Defendant has failed to properly investigate this claim and refused to pay for the loss as clearly indicated in the insurance policy that was issued in this matter.

IV.

Plaintiffs further allege that they have suffered a loss of use of their building and suffered a loss of income as a church because of the damage they suffered during the loss, as indicated; that Plaintiffs have been deprived of the use of their property due to the loss.

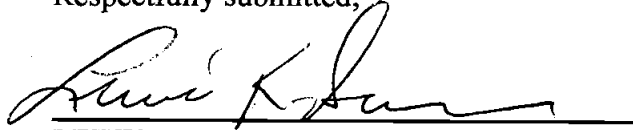
Plaintiffs sue the Defendant for bad faith, breach of contract, failure to properly inspect the property, fraud, and failure to return the premium that was paid for the insurance coverage resulting in a loss and damage to the property, loss of use of this building, and loss of membership.

V.

Plaintiffs further sue the Defendant for punitive damages for the failure to pay for the loss suffered by the Plaintiffs without any reasonable basis for said denial.

WHEREFORE, Plaintiffs sue the Defendant, Travelers Casualty Insurance Company, for the total sum of Four Hundred Fifty Thousand Dollars (\$450,000.00) for actual, compensatory, and punitive damages and demands a judgment when the issues herein are adjointed.

Respectfully submitted,



LEWIS K. GARRISON, SR. (#8311)

Attorney for Plaintiffs

145 Court Avenue, Suite 402

Memphis, TN 38103

(901) 527-6445

(901) 465-8899 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon opposing counsel and  
via U. S. mail, postage prepaid on this the 17<sup>th</sup> day of September, 2013.

  
LEWIS K. GARRISON, SR. (#8311)

**CERTIFIED MAIL™**

Case 2:13-cv-02827-JTF-tmp Document 1-2 Filed 10/23/13 Page 8 of 8 PageID 13

State of Tennessee  
Dept. of Commerce & Insurance  
Service of Process  
500 James Robertson Parkway  
Nashville, TN 37243



7012 1010 0002 9210 2022

FIRST CLASS



02 1M  
0004292626 OCT 04 2013  
MAILED FROM ZIP CODE 37243

\$ 06.31<sup>0</sup>

7012 1010 0002 9210 2022 10/02/2013  
TRAVELERS CASUALTY INS. CO. OF AMERICA  
2908 POSTON AVENUE, % C S C  
NASHVILLE, TN 37203

3720331312 C025

